

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jermaine BROWN

Case: 2:22-mj-30010
 Judge: Unassigned,
 Filed: 01-06-2022 At 10:47 AM
 Case No. USA v. JERMAINE BROWN (CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2020 through July 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. §§ 841(a)(1) 846

Conspiracy to Possess with Intent to Distribute Controlled substances

This criminal complaint is based on these facts:
 see attached affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: January 6, 2022

City and state: Detroit, MI



Complainant's signature

Special Agent Brian Sams, DEA

Printed name and title



Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

Affiant, Special Agent (SA) Brian W. Sams, Drug Enforcement Administration (DEA), being duly sworn, deposes and states the following:

INTRODUCTION

1. I am an “investigative or law enforcement officer” within the meaning of 18 U.S.C. § 2510(7). I am a Special Agent of the United States Drug Enforcement Administration (DEA) and have been so since July 2016, currently assigned to Group 2. Prior to my employment with the DEA, from April 2009 to March 2016, I was employed with the United States Border Patrol. While with the Border Patrol, I held the position of Border Patrol Agent in Sonoita, Arizona; and from July 2014 to March 2016, I was detailed to the DEA Tucson District Office, Tucson, Arizona as a Task Force Agent.

2. My official duties include investigating criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, 846, and 848. I have received special training in the enforcement of laws concerning controlled substances found in Title 21 of the United States Code. Some of the specialized training I have received includes, but not limited to, classroom instruction concerning narcotics smuggling, money laundering investigations, conspiracy, and complex investigations. I have been involved with various types of electronic surveillance, including the interception of wire

communications, as well as debriefing of defendants, witnesses, informants, and others who have knowledge of the distribution and transportation of controlled substances, the laundering and concealing of proceeds from drug trafficking.

3. I have conducted and participated in numerous investigations as a DEA Special Agent and formerly as USBP Task Force Agent assigned to the DEA that have resulted in the seizure of marijuana, prescription pills, synthetic drugs, cocaine, methamphetamine and heroin. I am familiar with and have participated in all of the normal methods of investigation, including but not limited to undercover, visual and video surveillance, questioning of witnesses, controlled deliveries, use of search and arrest warrants, management and use of informants, and electronic intercepts.

4. This affidavit is made in support of a criminal complaint for Jermaine BROWN for conspiracy to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1);.

5. Jermaine BROWN has a criminal history that includes:

- a. July 28, 2010 – Obstructing Judiciary or Congress or Legislature or Commission, Misdemeanor, Detroit Police Department
- b. September 30, 2010 – Fraudulent Activities, Retail Fraud, Misdemeanor Warren Police Department

- c. September 3, 2021 – Obstructing Police, Police Officer – Fleeing
– Eluding – Fourth Degree, Vehicle Code, Felony, Michigan State
Police

6. This affidavit does not include all the information and evidence gathered during the course of this investigation of BROWN rather it contains information providing probable cause to obtain a criminal complaint. The following factual information is based on my personal knowledge, the knowledge of DEA Task Force Agents, as well as investigation conducted by other law enforcement entities.

7. On November 30, 2020, law enforcement executed a federal search warrant of 192XX Helen Street, Detroit, Michigan. Jermaine BROWN who was present and taken into custody during the warrant and based on this investigation, he owned the house. During the search warrant, agents seized the following, among other things:

- a. Nitrile Gloves with residue which laboratory analysis confirmed substance on the gloves to be caffeine. A known cutting agent utilized in drug trafficking.
- b. Multiple food saver bags, three of which contained residue that laboratory analysis confirmed to be heroin, fentanyl, quinine and caffeine.

- c. Five Ziploc style bags and one freezer bag containing residue that laboratory analysis confirmed to be heroin, fentanyl, quinine and caffeine.
- d. One Chiappa firearms .410 shotgun
- e. 25 Winchester .410 shotgun shells
- f. Five .410 shotgun shells
- g. Other items in which based on my training and experience are used for drug trafficking, such as a kilo press, money bands, multiple phones.

8. On April 15, 2021, United States Postal Inspectors in Detroit Michigan seized two Priority Mail Express packages. One of the packages had the tracking number EJ 575 736 441. US Postal Inspectors obtained a search warrant and identified one brick shape object wrapped in tape weighing 1,020 grams. A laboratory analysis of the pressed brick confirmed the substance to be fentanyl.



9. On July 26, 2021, BROWN was arrested by the Warren Police Department for state charges of Weapons – Felony Firearm and One Count of Controlled Substance – Maintaining a Drug House. These charges were related to the November 2020 federal search warrant at Brown’s home.

10. During his arrest BROWN was in possession of a cell phone. DEA subsequently obtained a State of Michigan search warrant for the cell phone. During a search of the phone data, DEA identified that BROWN had queried the tracking

number of the USPS parcel seized on April 15, 2021 containing approximately 1,020 grams of fentanyl on multiple occasions.

11. USPIS further identified multiple T-Mobile IP addresses that checked on the parcel. The telephone number subscribed to the IP address was 248-985-60XX, the same number of assigned to the phone seized from BROWN.

CONCLUSION

12. Based on the facts stated above, there is probable cause to believe that Jermaine BROWN has committed violations of Title 21, United States Code, Sections 846 and 841(a)(1); 846, Conspiracy to Possess with Intent to Distribute Controlled substances.



Special Agent Brian W. Sams
Drug Enforcement Administration

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Jonathan J.C. Grey
United States Magistrate Judge

Date: January 6, 2022